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20 WELL'S FARGO BANK, N.A.

13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **SAN FRANCISCO DIVISION**

16 ALICIA HERNANDEZ, et al., individually and
17 on behalf of all others similarly situated,

18 Plaintiffs,

v.

19 WELL'S FARGO BANK, N.A.,

20 Defendant.

21 No. 3:18-cv-07354 WHA

22 **DECLARATION OF STACIE C. KNIGHT
IN SUPPORT OF DEFENDANT WELL'S
FARGO BANK, N.A.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

23 Date: April 2, 2020

24 Time: 8:00 a.m.

25 Courtroom: 12

26 Judge: Hon. William H. Alsup

1 I, Stacie C. Knight, hereby declare, under penalty of perjury, as follows:

2 1. I am Of Counsel at Winston & Strawn LLP, counsel for Defendant Wells Fargo Bank,
3 N.A. (“Wells Fargo”) in this matter. I make this declaration based on my personal knowledge and in
4 support of Wells Fargo’s Motion for Partial Summary Judgment.

5 2. I am personally familiar with the facts set forth in this declaration. If called as a
6 witness, I could and would competently testify to the matters stated herein.

7 3. Attached as **Exhibit 1** is a true and correct copy of Exhibit 399 to the August 2, 2019
8 Wells Fargo 30(b)(6) Deposition of Carmen Bell.

9 4. Attached as **Exhibit 2** are true and correct copies of excerpts of the August 2, 2019
10 Wells Fargo 30(b)(6) Deposition of Carmen Bell.

11 5. Attached as **Exhibit 3** are true and correct copies of excerpts of the January 17, 2020
12 Deposition of Dan Salah.

13 6. Attached as **Exhibit 4** is a true and correct copy of the December 10, 2019 Deposition
14 of Sandra Campos.

15 7. Attached as **Exhibit 5** is a true and correct copy of Exhibit 502 to the December 10,
16 2019 Deposition of Sandra Campos.

17 8. Attached as **Exhibit 6** is a true and correct copy of Exhibit 503 to the December 10.
18 2019 Deposition of Sandra Campos.

19 9. Attached as **Exhibit 7** is a true and correct copy of Exhibit 507 to the December 10,
20 2019 Deposition of Sandra Campos.

21 10. Attached as **Exhibit 8** is a true and correct copy of Exhibit 509 to the December 10,
22 2019 Deposition of Sandra Campos.

23 11. Attached as **Exhibit 9** is a true and correct copy of Exhibit 510 to the December 10,
24 2019 Deposition of Sandra Campos.

25 12. Attached as **Exhibit 10** is a true and correct copy of Exhibit 513 to the December 10,
26 2019 Deposition of Sandra Campos.

27 13. Attached as **Exhibit 11** is a true and correct copy of Exhibit 514 to the December 10,

1 2019 Deposition of Sandra Campos.

2 14. Attached as **Exhibit 12** is a true and correct copy of Exhibit 520 to the December 10,
3 2019 Deposition of Sandra Campos.

4 15. Attached as **Exhibit 13** is a true and correct copy of Exhibit 523 to the December 10,
5 2019 Deposition of Sandra Campos.

6 16. Attached as **Exhibit 14** is a true and correct copy of Exhibit 525 to the December 10,
7 2019 Deposition of Sandra Campos.

8 17. Attached as **Exhibit 15** are true and correct copies of excerpts of the January 13, 2020
9 Deposition of Derrick Cannon.

10 18. Attached as **Exhibit 16** is a true and correct copy of Exhibit 1273 to the January 13,
11 2020 Deposition of Derrick Cannon.

12 19. Attached as **Exhibit 17** are true and correct copies of excerpts of the December 10,
13 2019 Deposition of Jerry Dela Cruz.

14 20. Attached as **Exhibit 18** is a true and correct copy of Exhibit 604 to the December 10,
15 2019 Deposition of Jerry Dela Cruz.

16 21. Attached as **Exhibit 19** are true and correct copies of excerpts from the December 20,
17 2019 Deposition of Ruben Abel Gallardo.

18 22. Attached as **Exhibit 20** is a true and correct copy of Exhibit 1127 to the December 20,
19 2019 Deposition of Ruben Arel Gallardo.

20 23. Attached as **Exhibit 21** are true and correct copies of excerpts from the January 3,
21 2020 Deposition of Kimberly Gladman.

22 24. Attached as **Exhibit 22** is a true and correct copy of Exhibit 1234 to the January 3,
23 2020 Deposition of Kimberly Gladman.

24 25. Attached as **Exhibit 23** are true and correct copies of excerpts from the December 12,
25 2019 Deposition of Charles Gomez.

26 26. Attached as **Exhibit 24** is a true and correct copy of Exhibit 1004 to the December 12,
27 2019 Deposition of Charles Gomez.

1 27. Attached as **Exhibit 25** are true and correct copies of excerpts from the December 11,
2 2019 Deposition of Jameel Hayden.

3 28. Attached as **Exhibit 26** is a true and correct copy of Exhibit 703 to the December 11,
4 2019 Deposition of Jameel Hayden.

5 29. Attached as **Exhibit 27** are true and correct copies of excerpts from the January 9,
6 2020 Deposition of Jason Hewitt.

7 30. Attached as **Exhibit 28** is a true and correct copy of Exhibit 1253 to the January 9,
8 2020 Deposition of Jason Hewitt.

9 31. Attached as **Exhibit 29** are true and correct copies of excerpts from the January 24,
10 2020 Deposition of Elizabeth Messana.

11 32. Attached as **Exhibit 30** is a true and correct copy of Exhibit 1625 to the January 24,
12 2020 Deposition of Elizabeth Messana.

13 33. Attached as **Exhibit 31** are true and correct copies of excerpts from the January 13,
14 2020 Deposition of Martha Montenegro.

15 34. Attached as **Exhibit 32** is a true and correct copy of Exhibit 1304 to the January 13,
16 2020 Deposition of Martha Montenegro.

17 35. Attached as **Exhibit 33** are true and correct copies of excerpts from the December 16,
18 2019 Deposition of Donna Perreault.

19 36. Attached as **Exhibit 34** are true and correct copies of excerpts from the January 17,
20 2020 Deposition of Joseph Plescia.

21 37. Attached as **Exhibit 35** is a true and correct copy of Exhibit 1527 to the January 17,
22 2020 Deposition of Joseph Plescia.

23 38. Attached as **Exhibit 36** are true and correct copies of excerpts from the January 22,
24 2020 Deposition of Anna Schulke.

25 39. Attached as **Exhibit 37** is a true and correct copy of Exhibit 1551 to the January 22,
26 2020 Deposition of Anna Schulke.

27 40. Attached as **Exhibit 38** are true and correct copies of excerpts from the December 17,

1 2019 Deposition of Scott Seymour.

2 41. Attached as **Exhibit 39** is a true and correct copy of Exhibit 1183 to the December 17,
3 2019 Deposition of Scott Seymour.

4 42. Attached as **Exhibit 40** are true and correct copies of excerpts from the January 28,
5 2020 Deposition of Hortensia Torres.

6 43. Attached as **Exhibit 41** is a true and correct copy of Exhibit 1643 to the January 28,
7 2020 Deposition of Hortensia Torres.

8 44. Attached as **Exhibit 42** is a true and correct copy of the July 10, 2019 Wells Fargo
9 30(b)(6) Deposition of Robert Ferguson.

10 45. Attached as **Exhibit 43** is a true and correct copy of Exhibit 344 to the July 10, 2019
11 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

12 46. Attached as **Exhibit 44** is a true and correct copy of Exhibit 345 to the July 10, 2019
13 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

14 47. Attached as **Exhibit 45** is a true and correct copy of Exhibit 346 to the July 10, 2019
15 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

16 48. Attached as **Exhibit 46** is a true and correct copy of Exhibit 351 to the July 10, 2019
17 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

18 49. Attached as **Exhibit 47** is a true and correct copy of Exhibit 352 to the July 10, 2019
19 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

20 50. Attached as **Exhibit 48** is a true and correct copy of Exhibit 358 to the July 10, 2019
21 Wells Fargo 30(b)(6) Deposition of Robert Ferguson.

22
23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on this 20th day of February 2020.
25

26 */s/ Stacie C. Knight*
27 Stacie C. Knight
28